



PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY ▲ KITSAP COUNTY ▲ PIERCE COUNTY ▲ SNOHOMISH COUNTY

November 14, 1996

Gerry Brown
Manager, Safety and Environment
Ash Grove Cement Co.
3801 E Marginal Wy S
Seattle, WA. 98134

Dear Mr. Brown:

Notice of Construction (NOC) No. 6708

In your Notice of Construction Application dated September 27, 1996 (No. 6708) you requested the modification of Appendix A referenced in Condition No. 7 of Order of Approval No. 5730 dated December 29, 1994. Appendix A of NOC No. 5730 describes kiln startup, shutdown and maintenance procedures, and indicates the kiln startup cycle is to be initiated when fuel is burned, the temperature rises and rotation begins.

The emission limit in Condition No. 7 of 200 ppm SO₂ corrected to 10% O₂ was established per WAC 173-400-081 Startup and Shutdown (copy enclosed) and was to be monitored during startup and shutdown cycles. Your "narrative" description indicates there have been "peaks in the SO₂ emissions of 210 ppmc to 294 ppmc for the heat up phase of the starts." However, you did not request to change the numerical emission limit for SO₂ during startup periods.

Your application requests that the SO₂ continuous emission monitor and the SO₂ sorbent injection be both initiated when the kiln feed is started; however, the Kiln Heat Schedule graph of Appendix A indicates kiln feed occurs 24 hours and 1500° F after startup. This would mean there would be about one day or more of uncontrolled and unmonitored SO₂ emissions from the main stack during every startup when you indicate the current emission limit is exceeded.

PSAPCA has determined that your Notice of Construction Application is incomplete. In order to continue processing this application, you need to provide additional information addressing an alternate emission limit (ppm or lb/hr), other operating parameters, or other criteria to limit the kiln emissions during startup or shutdown periods to satisfy WAC 183-400-081.

Because this application for approval is a significant change from Amendment 1 to PSD 90-03 Approval, the Washington State Department of Ecology must be notified of this request.

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Chairman: Win Granlund, Commissioner, Kitsap County
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Please provide additional information by November 29, 1996. If you have any questions, please contact me at 689-4055.

Sincerely,

A handwritten signature in cursive script, reading "Fred L. Austin".

Fred L. Austin
Air Pollution Engineer

mj
Enclosure

cc: Alan Butler, DOE
D. S. Kircher
J. M. Willenberg
E. M. Gilpin
M. McAfee
R. G. Busterna

WAC 173-400-081 STARTUP AND SHUTDOWN.

In promulgating technology-based emission standards and making control technology determinations (e.g., BACT, RACT, LAER, BART) ecology and the authorities shall consider any physical constraints on the ability of a source to comply with the applicable standard during startup or shutdown.

Where ecology or the authority determines that the source or source category, operated and maintained in accordance with good air pollution control practice, is not capable of achieving continuous compliance with an emission standard during startup or shutdown, ecology or the authority shall include in the standard appropriate emission limitations, operating parameters, or other criteria to regulate the performance of the source during startup or shutdown conditions.

In modeling the emissions of a source for purposes of demonstrating attainment or maintenance of national ambient air quality standards, ecology and the authorities shall take into account any incremental increase in allowable emissions under startup or shutdown conditions authorized by an emission limitation or other operating parameter adopted under this rule.

Any emission limitation or other parameter adopted under this rule which increases allowable emissions during startup or shutdown conditions over levels authorized in an approved state implementation plan shall not take effect until approved by EPA as a SIP amendment.

[Statutory Authority: Chapter 70.94 RCW. 93-18-007 (Order 93-03), § 173-400-081, filed 8/20/93, effective 9/20/93.]